

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

C.A. No. 4:05-CV-40014-FDS

SANDRA S. KATZ,  
Plaintiff

v.

DONNA LEE H. WILLIAMS, INSURANCE  
COMMISSIONER OF THE STATE OF  
DELAWARE AS RECEIVER OF NATIONAL  
HERITAGE LIFE INSURANCE COMPANY IN  
LIQUIDATION  
Third Party Plaintiff

v.

FEDERAL DEPOSIT INSURANCE  
CORPORATION, UNITED STATES OF  
AMERICA, E. PERRY KING, ALAN MASON,  
ALAN MASON LEGAL SERVICES, P. C.,  
ALAN MASON LEGAL SERVICES, INC.,  
ALAN MASON SERVICES, P.C., ALAN MASON  
D/B/A ALAN MASON LEGAL SERVICES, INC.  
Third Party Defendant

and

E. PERRY KING,  
Fourth Party Plaintiff

v.

MANSOUR GAVAL,  
Fourth Party Defendant

ANSWER OF MANSOUR GAVAL TO FOURTH PARTY COMPLAINT

1. I don't know where E. Perry King lives.
2. I live at 431 Salisbury Street in Worcester.

3. I never signed a Purchase and Sale Agreement with E. Perry King. I am willing to take a Lie Detector test to prove this.
4. I never signed a Purchase and Sale Agreement with E. Perry King. Attorney Alan Mason told me that the word "taxes" on that form means real estate taxes and not personal or income taxes. I don't know why anyone would think that discharges, taxes and mortgages would include personal income taxes.
5. This is not true. I never signed a Purchase and Sale Agreement with E. Perry King. I did not break any agreement.
6. I don't know how E. Perry King was damaged. It's not because of me. He should go after Attorney Alan Mason if mistakes were made.
7. As I said before, this should not be my problem.

PLEASE DO NOT JUDGE AGAINST ME IT'S NOT MY FAULT. I SHOULD NOT HAVE TO PAY DAMAGES COSTS EXPENSES OR ATTORNEYS FEES.

I NEVER AGREED TO HOLD HIM HARMLESS.

MANSOUR GAVAL  
Mansour Gaval  
431 Salisbury Street, Worcester, MA 01609  
(508) 410-5557

August 17, 2005

Certificate of Service

I, Mansour Gaval, certify that I gave Attorney Timothy P. Wickstrom a copy of this paper today at his office in Worcester.

MANSOUR GAVAL  
Mansour Gaval August 17, 2005